

# Village of Sauget

Paul Sauget

Mayor

144781

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Sauget, Illinois 62206

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March 31, 1983

Mr. James Berlow  
Effluent Guidelines Division (WH-552)  
United States Environmental Protection  
Agency  
401 M. Street, S.W.  
Washington, D. C. 20460

Re: Nonferrous Metals Manufacturing Point Source  
Category Effluent Limitation, Guidelines,  
Pretreatment Standards and New Source Performance  
Standards, 48 Fed. Reg. 7032 (February 17, 1983)

Dear Mr. Berlow:

This letter is written on behalf of the Cerro Copper Products Company, which is one of five major industries in the Village of Sauget, Illinois. We request that these comments be incorporated into the record for the above-captioned proposed regulations.

Of particular concern to Cerro Copper Products Company is the Agency's proposal to make Pretreatment Standard for Existing Sources ("PSES") equivalent to the Best Available Treatment Economically Achievable ("BAT") for the secondary copper subcategory and to allow no discharge of any pollutants from an industrial user within that subcategory. The objection that Cerro Copper Products Company must make to this proposal goes beyond the individual hardship that implementation of this limitation would present to its manufacturing operations, and it is for this reason that I am submitting this comment to you as the Mayor of the Village of Sauget, Illinois.

Cerro Copper Products Company operates a plant located in the Village of Sauget, Illinois. The manufacturing operations at Cerro's Sauget facility generate process wastewater that is discharged to a publicly owned waste treatment plant. The POTW is owned by the Village of Sauget and is operated by a waste treatment association.

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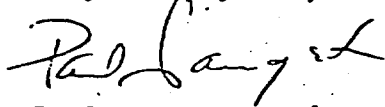
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Along with other industries and municipalities in the Southwest Illinois area, Cerro is participating in funding a regional wastewater treatment plant which will receive the effluent from the present Sauget facility. The financing for the local share of the Regional Plant (forty-two million dollars) was only accomplished because Cerro and three of the industries guaranteed their flow rate and funding participation for seventeen years. Cerro and the other industries committed to fund the Village of Sauget treatment plant and the new Regional Plant on the basis that these facilities would be deemed pretreatment facilities for those contributing industries. For this reason, the question of pretreatment regulations is most important.

The Village was assured by U.S. EPA that it was the Agency's intent that pretreatment facilities would not be required for contaminants treated by the present Sauget plant and to be treated by the Regional Plant. Therefore, insofar as the Agency would require a limitation of zero on discharges from Cerro's secondary copper operations, that limitation must be viewed in the context of the Agency's assurances concerning the application of pretreatment regulations to the particular situation that exists in Sauget. When making its commitment, U.S. EPA suggested that these comments be made as applicable categorical pretreatment standards were proposed. It is for this reason that I have submitted these comments.

The Village hereby requests that in promulgating the regulations for the secondary copper industry the Agency recognize the Sauget situation and make the appropriate exception for it. The agreements between Sauget and the Illinois Environmental Protection Agency and U.S. EPA to enable the financing of the Regional Treatment Facility for Southwest Illinois, as well as U.S. EPA's verbal commitment, are contrary to the imposition of a "zero discharge" limitation upon the secondary copper industry as PSES. Furthermore, imposition of this standard upon Cerro could cause serious detriment to the agreements to fund and construct an effective wastewater treatment system for the Village of Sauget and for the Southwest Illinois region.

Very truly yours,



Paul Sauget  
President, Board of Trustees

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